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BULLETIN NO.

93-6

Date: **January 15, 1994** Subject: **Label Requirements for Park Models**

Reference: **N.J.A.C. 5:23-4A**

The Department of Community Affairs (DCA) has become aware that certain structures, variously called "park trailers" or "park models," are being bought, sold, installed, and used as vacation living quarters, temporary residences, or occasionally, as primary residences without having met applicable Federal or State standards, and without bearing Federal or State labels. This is a violation of the Uniform Construction Code (UCC).

Park trailers are sometimes referred to as recreational vehicles (RVs), but they are not vehicles. True RVs are not subject to the UCC. RVs include travel trailers, camping trailers, truck campers, and motor homes. All RVs are self propelled, mounted on vehicles, can fold, bear license plates, or are small enough to be routinely towed on the highways without a special permit. They are always less than 320 square feet in floor area and 8 feet in width. An RV is either licensed by the Division of Motor Vehicles for self-propelled, on-road travel, or is trailerable for on-road travel behind a licensed motor vehicle.

In general, any residential structure which is of closed construction (not subject to ordinary plan review and inspections under the State UCC because it is factory built) should bear a New Jersey label, Industrialized Building Commission label, or United States Department of Housing and Urban Development (HUD) Manufactured Home label.

A park trailer is closed construction, which means that it arrives at the site already assembled so that most building, plumbing, mechanical, and electrical systems cannot be inspected because they are already concealed. It is intended for permanent or temporary residential use and is not a vehicle. Such a structure must be built and inspected to meet State or Federal standards. The required State or Federal label is proof that it meets these standards. It is subject to the UCC and should be treated as such in all respects.

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Park trailers may be found sited in campgrounds, in mobile home or manufactured home parks, or on individual lots. Wherever they are, and whether they are used for vacation purposes or as permanent residences, they are subject to the requirements of the UCC. Some may be marked as having been constructed in accordance with the American National Standards Institute standard 119.5 (ANSI 119.5). That standard does not contain structural standards such as those contained in the UCC.

A code official should not allow the installation of park trailers or park models which do not bear a State-approved label from the Recreation Vehicle Industry Association (RVIA) or HUD. Permits should be denied and the DCA should be notified if such installation is attempted. A DCA investigation has revealed that a significant number of park trailers have been installed in New Jersey. The DCA has issued a Cease-and-Desist Order against the manufacturers responsible. Construction officials should allow no installations of unlabeled units delivered after October 1, 1993 to dealers in New Jersey, whether in campgrounds or at other locations (unless advised otherwise by the DCA). A permit should be required for the installation of a properly labeled unit, as is the case with any other factory-built structure.

As a result of a settlement agreement reached with the manufacturers, the DCA has approved through October 1994 the use of an RVIA label which certifies that the park trailer has been constructed to the ANSI 119.5 standard. Work is also underway to revise this standard to include structural requirements specific to park trailers and, thus, to bring them into compliance with the UCC.

Additionally, the installation and use of park trailers or park models as residences for either permanent or vacation purposes is subject to the same New Jersey Department of Environmental Protection approvals as any other type of residence. The same prior approvals are necessary for them as for any other vacation or permanent dwelling.

The DCA will ensure that existing, unlabeled park trailers are safe and will do so through enforcement action directed at the manufacturers. Through the enforcement process, if a corrective action is necessary to bring unlabeled units to a safe standard, the plan of action will include the requirement to secure a permit. A corrective action plan will focus on specific life-safety issues and will be made available to construction officials who are impacted by the location of such existing units in their jurisdiction. Local construction officials are responsible to ensure that any site-specific structures associated with the installation of existing park models have not resulted in any unsafe conditions.

See Bulletin No. 93-7 for guidance on other site-built construction in campgrounds.